

EXHIBIT “A”

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
IN ADMIRALTY**

COMMODITIES & MINERALS
ENTERPRISE, LTD.

Plaintiff,

vs.

C.V.G. FERROMINERA ORINOCO, C.A.

Defendant.

Civil Action No.: 16-cv-00861-ALC

DECLARATION OF MARTA COLOMAR GARCIA

I, Marta Colomar Garcia, an attorney duly licensed and admitted to practice in and before the Courts of the state of New York and admitted to the bar of this Court, declares the following to be true pursuant to 28 U.S.C. § 1746.

1. I am an attorney with the law firm of Diaz, Reus & Targ, LLP (“DRT”), attorneys for Defendant C.V.G. Ferrominera Orinoco, C.A., in the above-captioned action. I am fully familiar with and have personal knowledge of the facts and circumstances set forth herein.

2. I respectfully submit this declaration in support of DRT’s motion for leave to withdraw as counsel of record.

3. On or about April, 2016, DRT was retained to represent Defendant C.V.G. Ferrominera Orinoco, C.A. (“FMO”) in this action and in five parallel arbitration proceedings that Plaintiff Commodities and Minerals Enterprise, Ltd. (“CME”) filed against FMO.

4. The first related arbitration hearings were scheduled to take place in New York City on October 26-27, 2016.

5. On the eve of those hearings, DRT was informed that it was to be replaced in this case and all of the related arbitration proceedings by the law firm of De Jesus & De Jesus.

6. On January 16, 2017, counsel for CME filed a letter motion requesting this Court to temporarily stay any decision with respect to FMO's motion to dismiss and/or vacate the Rule B attachment. (Doc. # 86).

7. DRT immediately sought instructions from FMO, which advised that DRT is no longer authorized to represent FMO in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct

Dated: Miami, Florida
January 20, 2017

/s/ Marta Colomar Garcia
Marta Colomar Garcia